

## REMARKS

Applicant respectfully traverses all the new rejections of the claims for anticipation or obviousness.

Claims 1 and 14 were rejected as anticipated by Campbell USP 6,112,818. In this reference a collapsing bow spring centralizer 17 is used to position the pipe as it is being delivered. When the pipe hits bottom a jar force moves the swage and the centralizer is stated to collapse during the expansion of the tubular. Claim 1 requires an initial deliver of the tubular into position followed by positioning it, after it has been delivered and not during the time it is delivered, to produce an annular space around the tubular. Contrary to the use of known bow spring centralizers that operate continuously as the tubing is delivered, claim 1 does not envision such a passive device that operates during the delivery of the tubing. Rather, it envisions an articulated device that can be triggered after the delivery of the tubing. Passive devices are out there constantly and can't be articulated into position only after delivery of the tubular as expressly required in claim 1.

Claim 1 is not anticipated by the Campbell reference.

Next claims 1 and 15 are rejected as anticipated by Chatterji USP 6,543,545. This reference describes in Column 4 Lines 19-27 a variety of passive centralizers 48 that can be used to position the pipe on its way down. This reference does not anticipate claim 1 for the exact same reasons given with respect to the Campbell reference above. Claim 1 requires the positioning to take place after delivery to the location not during delivery. For that reason claim 1 uses some device that can move the tubular to create the annular space after the tubular is in position. A passive centralizer, whether it is a bow spring as shown in Figure 1 referenced by the Examiner or other passive designs described in the reference in Column 4. As to claim 15, a mechanical swage is illustrated in the Chatterji reference as opposed to expansion of the tubular with internal pressure as recited in the claim.

Next the Examiner combines Chatterji with Wilson USP 5,228,518. Wilson does not use expansion and features positioning of the tubular after delivery with extending pistons. The base reference Chatterji uses a passive centralizer such as a bow spring design 48 that passively centralizes on the trip downhole and collapses on expansion of the underlying tubular. The extending pistons of Wilson use snap rings to prevent them

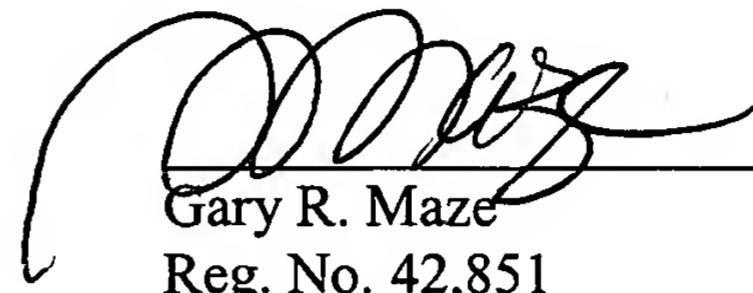
from going back in after they are extended. There is no basis to combine these references that clearly teach away from each other. One uses a passive centralizer that operates all the way down the borehole while the other has active pistons that are retracted for run in and deployed only after delivery. Those positioning devices are not compatible and work differently. One flexes passively and the other is locked in the extended position. Additionally Wilson doesn't contemplate expansion while Chatterji focuses on expansion. Hence Chatterji provides a collapsing and passive centralizer to accommodate expansion while Wilson is more interested in creating an annular space to get proper cementing and has no interest in expansion. For that reason his snap ring design to prevent the extended pistons from going back in can be so light duty because there is no expansion contemplated. These references are addressing disparate issues downhole with different equipment and hardly suggest any realistic way to pick and choose some components from one and insert them into the other when their modes of operation diverge so completely. Claim 1-5, 7-13 and 18-20 are not obvious over this attempted combination of references.

Finally the Examiner relies on Maguire 2003/0047322 that shows swage expansion of one tubular inside another with no use for centralizers or any positioning of the tubular after delivering it. The reason is the inner tubular is fully expanded into the surrounding tubular. This design has no need for creating an annular space for any purpose after delivery. It simply expands the inner tubular from within no matter how it sits initially in the surrounding tubular. The expansion is concluded when the inner tubular has been expanded fully against its surrounding tubular. The Examiner supposes two things about this reference. First is that the delivering equipment would do a positioning function for the inner tubular when that conclusion is not supported by the Maguire specification. Secondly, the Examiner suggests that positioning the tubular after running it into a surrounding tubular would even matter when the inner tubular is plastically deformed to a bigger diameter than the initial inside diameter of the outer tubular. In other words, this reference uses a method that has no need for positioning after delivery and therefore it fails to render claim 1 obvious where claim 1 envisions performing steps that are not stated or not needed to perform the Maguire method. Claims 1, 2, 4, 6 and 9 are not obvious in view of Maguire.

Allowance of the remaining claims is respectfully requested.

Respectfully submitted,

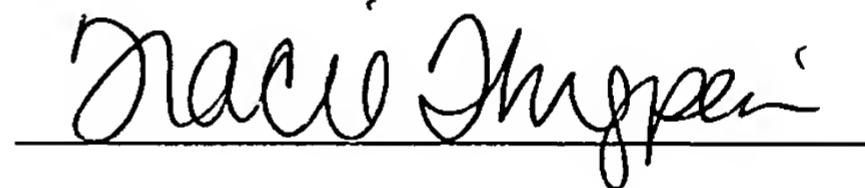
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